## Miles Mayhew - ECA Workshop: Follow-up

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To:

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Date:

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Subject:

ECA Workshop: Follow-up

## Miles:

I'd like to thank you for the workshop last night. From experience, I know it can be very challenging to keep a disparate public group focused on a specific task and you did a great job.

I am a biologist specializing in wetland delineation and ecology with over 12 years of experience specifically consulting on ECA compliance, delineation and review for various WA jurisdictions. I would very much like to be involved in and/or informed on Seattle's ECA update process, so please include me on any communication lists in this regard that may exist.

As mentioned to you last night, I have some very specific comments about effective changes/clarifications needed in Seattle's ECA code. However, I would first like to offer kudos to both Rob Knable and Maggie Glowacki who have always done a fabulous job in DCLU ECA consultation on biological issues - especially given limited staff. Regardless of the fairly extreme views often expressed at the public meeting last night, I have found that Rob and Maggie always offer very practical, reasonable and biologically sound solutions to development issues pertaining to Seattle ECA protection.

Specific issues that have arisen during ECA consultation that should be addressed in the code update:

- Biologist Qualification. As mentioned, I often have to rely on a landscape architect's stamp to certify biological documentation pertaining to Seattle ECA (e.g., ECA reconnaissance studies, delineation, native vegetation restoration plans, native vegetation planting plans, etc.). Typically, those stamping such documents have little or no experience with ECA issues. Seattle code updates should include a statement qualifying experienced biologists (by academic degree, years of experience etc.) to complete pertinent documentation for DPD.
- Stream Delineation. Although most jurisdictions clearly identify parameters specifically delineating wetlands, few (if any) provide suitable delineation parameters for streams (riparian corridors). Maggie did a great job clarifying this issue as it pertained to small, ephemeral drainage channels that had developed after a winter precipitation event on the potential COS fire and police training facility site on the southern city border. However, if there were clear rules for defining streams (riparian corridors) perhaps specifying how long a channel must exist (no matter the size) to be deemed a jurisdictional stream -- project biologists could limit necessary consulting with DPD.
- COS Wetland Rating. Maggie had mentioned the city was considering adopting a more conventional wetland rating system (e.g., Class 1-4).
  This may be helpful. At the very least, parameters defining a wetland of exceptional value should be reviewed and defined.

Thanks for the consideration. Please let me know how these issues will be addressed in the update process. Although I am suggesting further specific delineating parameters for ECA, I actually prefer to allow DPD biologists broader discretion in code interpretation and development of innovative solutions to ECA/development conflicts as they have done in

the past. However, allowing for broad interpretation risks sacrificing consistency with changes in city staff.

Thanks again. I look forward to further updates on the process.

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